

NORLITE, LLC

628 SO. SARATOGA STREET PO BOX 684 COHOES, NY 12047 PHONE: (518) 235-0401 FAX: (518) 235-0233

March 27, 2014

Ms. Nancy Baker
Deputy Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECE

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng Air Compliance Branch United States Environmental Protection Agency Region 2 290 Broadway

New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedances Report

Kiln 1: 02/20/14 – 03/26/14 Kiln 2: 02/20/14 – 03/26/14

Dear Sir/Madam:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite, LLC (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 02/20/14 thru 03/26/14. The attached document explains each of the "malfunctions" for Kilns One and Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. The stack gas cutoffs were attributed to water droplets from the Mist Pad contacting the stack gas probe, water vapor in the stack condensing from the extreme cold and wind and contacting the stack gas probe, or a hairline crack which has formed on the heat probe of the stack gas flow unit. For two of the causes, the water contacting the probe caused it to fault. The hairline crack caused the heat probe of the unit to read inaccurate which translated into faulty flow rates. Attempts were made to adjust the ID fan speed to combat the water droplet movement without significant success. Norlite has been working with the Department to approve the Optical Flow Sensor Technology for measuring flow rate in the kiln system. Norlite submitted a proposal to the Department on December 24, 2013 requesting approval to make the Optical Flow Sensor the certified technology for measuring stack gas flow on Kiln 1. On January 20, 2014, the Department granted Norlite permission to submit a permit modification which once approved would make the Optical Flow Sensor the certified technology on Kiln 1. Norlite has completed the final programming to calculate the velocity into standard cubic feet per minute and submitted a permit modification request to the Department on March 25, 2014. With the permit modification request, Norlite submitted modified permit pages, the results of a RATA test, and 1 month of comparison data. Please see below for a history of the work completed thus far.

Norlite has been working to resolve stack gas span cutoffs in general for almost two years. Norlite has been working with the DEC to install a new optical flow technology to monitor stack gas flow rate. A test unit has been installed on Kiln 1 and tested to obtain additional information to be used in future calculations. Norlite conducted an official RATA test on the optical flow sensor in Kiln 1 on November 26, 2013 which yielded very good results. The final RATA Testing report has been received by Norlite and submitted along with a proposal for implementing official use of the unit to the DEC on December 24,

DCL: 2421



NORLITE, LLC

2013. Norlite prepared and submitted a permit modification request to the Department on March 25, 2014. The permit modification request was to modify the current Part 373 and Title V permits to address the addition of the optical flow sensor as the unit to monitor stack gas flow rate. Along with the permit modification request, Norlite submitted comparison data, modified permit pages, and additional technical information about the technology. After final approval is given for the unit on Kiln 1, Norlite will install a unit on Kiln 2 with an expedited schedule for completion which will hopefully see the unit in certified operation by the end of April or mid-May 2014. An extra challenge exists with the installation of the optical flow sensor on Kiln 2 in that access to where the unit will be located is very limited. Norlite will need to install a platform so facility personnel can easily and safely access the unit for routine preventative maintenance. Norlite does not expect the installation of the platform to delay the installation of the optical flow sensor on Kiln 2.

Norlite has been working with the DEC to improve LGF delivery and handling at the kilns to address these types of cutoffs. In April 2013, the DEC conditionally approved Norlite's plan to remove the minimum LGF Line Pressure requirement, allow a positive displacement pump to be used for fuel flow control, and allow the use of a recirculation line for use during times when off LGF. The DEC also requested a six month study be conducted without a minimum LGF Line Pressure requirement. The study was started on May 01, 2103 and completed on October 31, 2013. Norlite conducted an extensive search for a positive displacement pump which would allow variable speed control, have tight pump tolerance, and have suitable reliability for long term use. The results of the six month study which summarized over 4 million lines of operational data between the two kilns was submitted to the DEC on December 5, 2013. Based from the results of the six month study, Norlite feels the data supports the removal of the minimum LGF Line Pressure requirement. Norlite has concluded that a positive displacement pump which meets all the needed criteria does not exist. As stated previously, Norlite has acquired the assistance of a process engineering firm to assist in the search for a suitable positive displacement pump and conduct an overall review of the entire kiln feed system to provide a proposal for improving the kiln fuel feed system. The process engineering firm has been supplied with facility drawings, had several discussions with Norlite personnel, and taken a facility tour to better understand the facility operations as they relate to fuel delivery at the kilns. Norlite submitted a proposal provided by SPEC Engineering to the DEC on December 31, 2013 for review and approval. The proposal was to use an automated control loop to control pressures and fuel flow rates at the kilns. On January 13, 2014, the DEC approved the overall concept of the proposal with the requirement that additional engineering specifications be provided by certain dates for ultimate approval of the entire project.

Norlite and SPEC Engineering have completed an extensive hydrology study of the entire LGF Fuel delivery system to ensure that proper velocities can be maintained throughout the piping system to prevent material buildup and keep the LGF homogeneously mixed. Norlite and SPEC Engineering have also meet with the Department or spoke with the Department on the phone several time to go over the hydrology study as well as keep the Department up to date on the overall progress of the project. Norlite and SPEC Engineering are spending extra time on the engineering design of the overall kiln fuel delivery system to help minimize as many problems as possible when installation occurs. Norlite and SPEC are committed to ensuring the kiln fuel delivery system operates as expected with as few troubleshooting issues as possible, for this to occur, extra engineering is needed during the design phase. Norlite has setup another meeting with the Department in early April to go over the piping layout and other engineering design pieces, which will be presented in 3-D to help fully visualize the overall layout.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.



NORLITE, LLC

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tom.vanvranken@tradebe.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken Environmental Manager

Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments

James Lansing, NYSDEC – CO w/attachments Joseph Hadersbeck, NYSDEC – R4w/attachments

Jim Quinn, NYSDEC – R4 w/attachments

Tita LaGrimas – Tradebe



| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|----|-------------|---|---------------------|-------|---|
| 2/21/2014 | 14:49:41 | 2/21/2014 | 14:51:49 | 0:02:08 | 39 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/21/2014 | 14:59:05 | 2/21/2014 | 15:00:12 | 0:01:07 | 40 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/21/2014 | 15:32:56 | 2/21/2014 | 15:58:11 | 0:25:15 | 41 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/22/2014 | 17:04:56 | 2/22/2014 | 17:05:15 | 0:00:19 | 42 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/22/2014 | 17:06:22 | 2/22/2014 | 17:25:32 | 0:19:10 | 43 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| | | | | | | | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist | Stack Gas Flow Rate | · | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/23/2014 | 13:20:47 | 2/23/2014 | 14:30:26 | 1:09:39 | 44 | Malfunction | Pad Hitting the Probe Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist | | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets |
| 2/24/2014 | 0:32:41 | 2/24/2014 | 1:10:46 | 0:38:05 | 45 | Malfunction | Pad Hitting the Probe Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist | Stack Gas Flow Rate | Span | From Hitting the Probe The ID Fan Speed Was Decreased to Help Prevent Water Droplets |
| 2/24/2014 | 1:32:23 | 2/24/2014 | 3:18:59 | 1:46:36 | 46 | Malfunction | Pad Hitting the Probe / Rinsed Mist Pad Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist | Stack Gas Flow Rate | Span | From Hitting the Probe The ID Fan Speed Was Decreased to Help Prevent Water Droplets |
| 2/24/2014 | 9:01:36 | 2/24/2014 | 9:03:13 | 0:01:37 | 47 | Malfunction | Pad Hitting the Probe Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist | Stack Gas Flow Rate | Span | From Hitting the Probe The ID Fan Speed Was Decreased to Help Prevent Water Droplets |
| 2/24/2014 | 17:23:50 | 2/24/2014 | 17:24:56 | 0:01:06 | 48 | Malfunction | Pad Hitting the Probe Instantaneous Upper Instrument Setpoint Reached for | Stack Gas Flow Rate | Span | From Hitting the Probe |
| 2/24/2014 | 20:50:16 | 2/24/2014 | 21:34:29 | 0:44:13 | 49 | Malfunction | Stack Gas Span Due to a Dirty Stack Gas Probe | Stack Gas Flow Rate | Span | I & E Cleaned the Probe The ID Fan Speed Was |
| 2/24/2014 | 21:56:16 | 2/24/2014 | 23:19:05 | 1:22:49 | 50 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe / Rinsed Mist Pad | Stack Gas Flow Rate | Span | Decreased to Help Prevent Water Droplets From Hitting the Probe |



| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|----|-------------|--|--|-------|---|
| 2/25/2014 | 10:44:13 | 2/25/2014 | 10:44:52 | 0:00:39 | 51 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 0:26:02 | 2/26/2014 | 0:26:55 | 0:00:53 | 52 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 9:50:50 | 2/26/2014 | 9:51:37 | 0:00:47 | 53 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure | Front Kiln Pressure, 1 Second Delay | | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 2/26/2014 | 11:05:37 | 2/26/2014 | 11:06:29 | 0:00:52 | 54 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 12:47:25 | 2/26/2014 | 13:01:36 | 0:14:11 | 55 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 20:20:03 | 2/26/2014 | 20:24:28 | 0:04:25 | 56 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 4:34:05 | 2/27/2014 | 4:35:09 | 0:01:04 | 57 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 4:47:08 | 2/27/2014 | 4:47:50 | 0:00:42 | 58 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 5:40:14 | 2/27/2014 | 5:40:46 | 0:00:32 | 59 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 7:04:36 | 2/27/2014 | 7:05:00 | 0:00:24 | 60 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 7:12:06 | 2/27/2014 | 7:12:38 | 0:00:32 | 61 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |



| | Noune | | | | | | CEEDANCE REPORT - KILN 1 | | | |
|------------|-------------|-----------|----------|----------|----|-------------|--|---------------------|-------|---|
| | SHALE AGGRE | | | | | | 02/20/14 - 03/26/14 | | | |
| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
| 2/27/2014 | 7:16:21 | 2/27/2014 | 7:16:46 | 0:00:25 | 62 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 7:19:55 | 2/27/2014 | 10:46:03 | 3:26:08 | 63 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 10:58:47 | 2/27/2014 | 10:59:12 | 0:00:25 | 64 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 11:01:48 | 2/27/2014 | 11:02:14 | 0:00:26 | 65 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 11:02:25 | 2/27/2014 | 12:34:45 | 1:32:20 | 66 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 12:44:26 | 2/27/2014 | 12:44:59 | 0:00:33 | 67 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 12:46:05 | 2/27/2014 | 12:46:26 | 0:00:21 | 68 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 12:51:58 | 2/27/2014 | 12:52:56 | 0:00:58 | 69 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 13:49:38 | 2/27/2014 | 13:56:28 | 0:06:50 | 70 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 14:14:39 | 2/27/2014 | 14:18:01 | 0:03:22 | 71 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 17:53:24 | 2/27/2014 | 17:54:10 | 0:00:46 | 72 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 18:24:14 | 2/27/2014 | 18:24:37 | 0:00:23 | 73 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |



| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------------|-----------------|----------|----|-------------|--|--|-------|---|
| 2/27/2014 | 19:46:39 | 2/27/2014 | 19:47:20 | 0:00:41 | 74 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 19:55:01 | 2/27/2014 | 19:55:51 | 0:00:50 | 75 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 19:55:57 | 2/27/2014 | 19:56:32 | 0:00:35 | 76 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 20:00:57 | 2/27/2014 | 20:01:34 | 0:00:37 | 77 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 20:02:09 | 2/27/2014 | 20:02:42 | 0:00:33 | 78 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 20:15:30 | 2/27/2014 | 20:16:14 | 0:00:44 | 79 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| | | | | | | | | | | Third Party Process |
| 2/27/2014 | 20:25:42 | 2/27/2014 | 23:12:27 | 2:46:45 | 80 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure | Front Kiln Pressure, 1 Second Delay | Opl | Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 2/27/2014 | 23:27:54 | 2/27/2014 | 23:28:58 | 0:01:04 | 81 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| | | | | | | | | | | Third Party Process Engineers Are Reviewing |
| 2/27/2014 | 23:29:04 | 2/27/2014 | 23:29:50 | 0:00:46 | 82 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure | Front Kiln Pressure, 1 Second Delay | Opl | the Feed System to Provide Operational Improvements |
| 2/27/2014 | 23:29:05 | 2/27/2014 | 23:29:50 | 0:00:45 | 83 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| | | | | | | | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist | Charle Can Flow D. | · | The ID Fan Speed Was Decreased to Help Prevent Water Droplets |
| 2/27/2014 | 23:33:21 | 2/27/2014 | 23:34:04 | 0:00:43 | 84 | Malfunction | Pad Hitting the Probe | Stack Gas Flow Rate | Span | From Hitting the Probe |



| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|----|-------------|--|--|-------|---|
| 2/27/2014 | 23:37:14 | 2/27/2014 | 23:37:49 | 0:00:35 | 85 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 23:44:51 | 2/27/2014 | 23:45:47 | 0:00:56 | 86 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 23:47:22 | 2/27/2014 | 23:48:09 | 0:00:47 | 87 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 7:16:07 | 2/28/2014 | 7:17:19 | 0:01:12 | 88 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 14:33:03 | 2/28/2014 | 14:33:26 | 0:00:23 | 89 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 14:33:31 | 2/28/2014 | 14:35:05 | 0:01:34 | 90 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure | Front Kiln Pressure, 1 Second Delay | Opl | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 2/28/2014 | 15:06:13 | 2/28/2014 | 15:46:09 | 0:39:56 | 91 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 15:59:26 | 2/28/2014 | 15:59:51 | 0:00:25 | 92 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 16:12:53 | 2/28/2014 | 16:14:04 | 0:01:11 | 93 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 16:34:11 | 2/28/2014 | 16:35:11 | 0:01:00 | 94 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 16:50:41 | 2/28/2014 | 16:51:30 | 0:00:49 | 95 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |



| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|-----|-------------|--|---------------------|-------|---|
| 2/28/2014 | 17:02:14 | 2/28/2014 | 17:30:16 | 0:28:02 | 96 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 19:42:46 | 2/28/2014 | 19:43:15 | 0:00:29 | 97 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 20:04:08 | 2/28/2014 | 20:04:40 | 0:00:32 | 98 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 22:24:43 | 2/28/2014 | 22:25:05 | 0:00:22 | 99 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 22:39:16 | 2/28/2014 | 22:39:49 | 0:00:33 | 100 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/28/2014 | 22:56:48 | 2/28/2014 | 23:52:55 | 0:56:07 | 101 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 3/1/2014 | 0:18:51 | 3/1/2014 | 0:19:12 | 0:00:21 | 102 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/1/2014 | 0:22:16 | 3/1/2014 | 0:56:36 | 0:34:20 | 103 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/1/2014 | 1:14:59 | 3/1/2014 | 1:15:43 | 0:00:44 | 104 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/1/2014 | 1:20:11 | 3/1/2014 | 1:30:43 | 0:10:32 | 105 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/1/2014 | 2:55:50 | 3/1/2014 | 2:56:19 | 0:00:29 | 106 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |



| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|----------|-----------------|----------|-----|-------------|--|---------------------|-------|---|
| 3/1/2014 | 7:05:17 | 3/1/2014 | 7:05:38 | 0:00:21 | 107 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 3/1/2014 | 7:22:17 | 3/1/2014 | 7:22:40 | 0:00:23 | 108 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 3/1/2014 | 8:23:34 | 3/1/2014 | 8:24:10 | 0:00:36 | 109 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 3/1/2014 | 11:21:36 | 3/1/2014 | 11:22:06 | 0:00:30 | 110 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 3/1/2014 | 14:42:45 | 3/1/2014 | 14:43:10 | 0:00:25 | 111 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 3/3/2014 | 4:00:58 | 3/3/2014 | 4:01:42 | 0:00:44 | 112 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 4:03:37 | 3/3/2014 | 4:04:12 | 0:00:35 | 113 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 5:02:31 | 3/3/2014 | 5:03:46 | 0:01:15 | 114 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 5:16:14 | 3/3/2014 | 5:17:49 | 0:01:35 | 115 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |



02/20/14 - 03/26/14

| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|-------------|-----------|-----|-------------|--|--|-------|---|
| <u> </u> | Otal Tillo | Liid Bato | Liid Tiilio | Downtaino | | LVOIIL | - Cudoo | T didillotoi | | 001100111071011011 |
| 3/3/2014 | 5:22:30 | 3/3/2014 | 5:35:14 | 0:12:44 | 116 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 10:24:43 | 3/3/2014 | 10:25:04 | 0:00:21 | 117 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 18:00:48 | 3/3/2014 | 18:01:09 | 0:00:21 | 118 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Frontend Differential Kiln Pressure | Front Kiln Pressure, 1 Second Delay | Opl | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 3/3/2014 | 18:47:19 | 3/3/2014 | 18:48:38 | 0:01:19 | 119 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 19:32:46 | 3/3/2014 | 19:33:05 | 0:00:19 | 120 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 20:04:13 | 3/3/2014 | 20:06:50 | 0:02:37 | 121 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 22:24:47 | 3/3/2014 | 22:29:44 | 0:04:57 | 122 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/3/2014 | 22:46:02 | 3/3/2014 | 23:16:50 | 0:30:48 | 123 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/4/2014 | 5:42:02 | 3/4/2014 | 5:43:11 | 0:01:09 | 124 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |



3/8/2014

1:17:17

3/8/2014

1:17:41

0:00:24

129 Malfunction

NORLITE, LLC MACT EXCEEDANCE REPORT - KILN 1 02/20/14 - 03/26/14

| | | | | | | | 02/20/14 - 03/20/14 | | | |
|------------|------------|----------|-----------------|----------|-----|-------------|--|------------------------|-------|---|
| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
| 3/4/2014 | 6:41:11 | 3/4/2014 | 6:41:33 | 0:00:22 | 125 | Malfunction | Strong Winds Out of the South Caused the Water Vapor in the Stack to Condense and Contact the Stack Gas Probe Causing the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/4/2014 | 7:53:01 | 3/4/2014 | 8:01:17 | 0:08:16 | 126 | Malfunction | The Operators Were Controlling Fuel Flow Using Valves Which Caused a Fuel Surge to Occur and Trigger the Instantaneous Upper Instrument Setpoint to be Reached for LGF Flow Span | LGF Flow | Span | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 3/4/2014 | 16:53:55 | 3/4/2014 | 16:54:32 | 0:00:37 | 127 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| 3/6/2014 | 8:49:50 | 3/6/2014 | 8:50:20 | 0:00:30 | 128 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The Kiln Was Shutdown On 3/12/14 for Scrubber Inspection and Repair |
| | | | | | | | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the | Front Kiln Pressure, 1 | 0.1 | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational |

Frontend Differential Kiln Pressure

Second Delay

Opl

Improvements



02/20/14 - 03/26/14

| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|-----|-------------|--|---|-------|---|
| 2/21/2014 | 2:03:39 | 2/21/2014 | 2:04:19 | 0:00:40 | 127 | Malfunction | The Operators Were Controlling Fuel Flow Using Valves Which Caused a Fuel Surge to Occur, Affecting the Rear Chamber Pressure System | Back Chamber Pressure, 1 Second Delay | Opl | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 2/24/2014 | 18:25:41 | 2/24/2014 | 19:58:47 | 1:33:06 | 128 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/24/2014 | 20:08:32 | 2/24/2014 | 20:30:33 | 0:22:01 | 129 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 0:39:53 | 2/26/2014 | 0:40:29 | 0:00:36 | 130 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 1:16:22 | 2/26/2014 | 1:24:16 | 0:07:54 | 131 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 2:14:21 | 2/26/2014 | 2:20:48 | 0:06:27 | 132 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 2:26:16 | 2/26/2014 | 2:34:50 | 0:08:34 | 133 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 8:26:42 | 2/26/2014 | 8:27:09 | 0:00:27 | 134 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 9:23:44 | 2/26/2014 | 9:24:06 | 0:00:22 | 135 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 10:30:57 | 2/26/2014 | 10:31:33 | 0:00:36 | 136 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 10:48:47 | 2/26/2014 | 10:49:10 | 0:00:23 | 137 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |



| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|-----|-------------|--|---------------------|-------|--|
| 2/26/2014 | 11:26:49 | 2/26/2014 | 11:27:08 | 0:00:19 | 138 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 13:08:09 | 2/26/2014 | 13:08:34 | 0:00:25 | 139 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 13:12:42 | 2/26/2014 | 13:13:23 | 0:00:41 | 140 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 13:20:01 | 2/26/2014 | 13:20:29 | 0:00:28 | 141 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 13:24:07 | 2/26/2014 | 14:00:15 | 0:36:08 | 142 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to the Stack Gas Probe Being Dirty | Stack Gas Flow Rate | Span | I & E Cleaned the Stack Gas Probe |
| 2/26/2014 | 14:04:02 | 2/26/2014 | 16:57:15 | 2:53:13 | 143 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe / Rinsed Mist Pad | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe / The Mist Pad Was Rinsed |
| 2/26/2014 | 17:35:48 | 2/26/2014 | 17:37:02 | 0:01:14 | 144 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 17:39:47 | 2/26/2014 | 17:45:22 | 0:05:35 | 145 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 17:51:33 | 2/26/2014 | 17:52:26 | 0:00:53 | 146 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 17:52:53 | 2/26/2014 | 18:08:23 | 0:15:30 | 147 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/26/2014 | 18:26:01 | 2/26/2014 | 20:50:15 | 2:24:14 | 148 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe / No Shale Feed | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 2/27/2014 | 20:47:44 | 2/27/2014 | 22:02:55 | 1:15:11 | 149 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |



| 02/20 | /14 - | 03/ | 26/1 | 4 |
|-------|--------------------|---------|------|---|
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| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------------|-----------------|----------|-----|-------------|--|---------------------|-------|--|
| 3/1/2014 | 7:56:25 | 3/1/2014 | 7:56:57 | 0:00:32 | 150 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| | | | | | | | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas | | | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back |
| 3/1/2014 | 15:05:51 | 3/1/2014 | 15:06:34 | 0:00:43 | 151 | Malfunction | Span | Stack Gas Flow Rate | Span | to Normal Operation Levels |
| 3/1/2014 | 15:24:49 | 3/1/2014 | 15:25:38 | 0:00:49 | 152 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| 3/1/2014 | 15:28:23 | 3/1/2014 | 15:28:47 | 0:00:24 | 153 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| 3/1/2014 | 15:29:40 | 3/1/2014 | 15:30:19 | 0:00:39 | 154 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| 3/1/2014 | 15:35:50 | 3/1/2014 | 15:43:58 | 0:08:08 | 155 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| | | | | | | | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas | | | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back |
| 3/1/2014 | 15:49:54 | 3/1/2014 | 15:50:45 | 0:00:51 | 156 | Malfunction | Span After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas | Stack Gas Flow Rate | Span | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back |
| 3/3/2014 | 6:02:32 | 3/3/2014 | 6:10:03 | 0:07:31 | 157 | Malfunction | Span | Stack Gas Flow Rate | Span | to Normal Operation Levels |



| Start Date | Start Time | End Date | Fnd Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|----------|----------|----------|-----|-------------|---|---|-------|--|
| 3/3/2014 | 22:20:38 | 3/3/2014 | 22:24:30 | 0:03:52 | 158 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| 3/4/2014 | 4:14:09 | 3/4/2014 | 4:55:37 | 0:41:28 | 159 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| | | | | | | | The Operators Wars Controlling First Flour Heiner | Daali Chambar | | Third Party Process |
| 3/4/2014 | 5:37:42 | 3/4/2014 | 5:38:19 | 0:00:37 | 160 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Chamber Differential Pressure System | Back Chamber Pressure, 1 Second Delay | Opl | Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 3/4/2014 | 5:54:20 | 3/4/2014 | 5:54:46 | 0:00:26 | 161 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate | Span | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| 0/4/0044 | 0.04.00 | 0/4/0044 | 0.05.00 | 0.00.00 | 100 | | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas | Otack Oca Flow Data | _ | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back |
| 3/4/2014 | 6:24:36 | 3/4/2014 | 6:25:06 | 0:00:30 | 162 | Malfunction | Span After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas Span | Stack Gas Flow Rate Stack Gas Flow Rate | Span | to Normal Operation Levels The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back to Normal Operation Levels |
| 3/4/2014 | 20:47:29 | 3/4/2014 | 21:55:45 | 1:08:16 | 163 | Malfunction | After Extensive Troubleshooting and Adjustments Made to the Kiln System, It Was Determined a Small Crack Had Formed On One of the Probe of the Stack Gas Unit. This Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas | Stack Gas I low Rate | Эрап | The Stack Gas Probe Was Replaced on the Early Morning of 3/5/14 Which Returned the Flow Rate Back |
| 3/4/2014 | 21:58:12 | 3/4/2014 | 23:04:57 | 1:06:45 | 164 | Malfunction | Span Instantaneous Upper Instrument Setpoint Reached | Stack Gas Flow Rate | Span | to Normal Operation Levels |
| 3/5/2014 | 20:18:16 | 3/5/2014 | 23:39:58 | 3:21:42 | 165 | Malfunction | for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | I & E Cleaned the Probe The ID Fan Speed Was |
| 3/6/2014 | 21:12:05 | 3/6/2014 | 23:06:48 | 1:54:43 | 166 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | Decreased to Help Prevent Water Droplets From Hitting the Probe |



| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------------|-----------------|----------|-----|-------------|--|---|-------|---|
| 3/7/2014 | 21:21:10 | 3/7/2014 | 22:11:50 | 0:50:40 | 167 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe | Stack Gas Flow Rate | Span | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 3/15/2014 | 16:04:26 | 3/15/2014 | 16:06:37 | 0:02:11 | 168 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Chamber Differential Pressure System | Back Chamber Pressure, 1 Second Delay | Opl | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 3/16/2014 | 15:12:53 | 3/16/2014 | 17:07:48 | 1:54:55 | 169 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Water Droplets From the Mist Pad Hitting the Probe / Rinsed Mist Pad | Stack Gas Flow Rate | | The ID Fan Speed Was Decreased to Help Prevent Water Droplets From Hitting the Probe |
| 3/22/2014 | 16:20:20 | 3/22/2014 | 16:21:45 | 0:01:25 | 170 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Chamber Differential Pressure System | Back Chamber Pressure, 1 Second Delay | Opl | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements |
| 3/25/2014 | 0:27:23 | 3/25/2014 | 0:28:33 | 0:01:10 | 171 | Malfunction | The Operators Were Controlling Fuel Flow Using Valve Which Caused a Fuel Surge to Occur, Affecting the Chamber Differential Pressure System | Back Chamber Pressure, 1 Second Delay | Opl | Third Party Process Engineers Are Reviewing the Feed System to Provide Operational Improvements |